

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America  
v.

Ross Hoover

Defendant(s)

Case No.

1:21-mj-203

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 4, 2021 in the county of Marion in the  
Southern District of Indiana, the defendant(s) violated:

Code Section

18 U.S.C. § 1951(a)

Offense Description

Hobbs Act Robbery

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

/s/ Leonard P. Rothermich

Complainant's signature


Leonard P. Rothermich, SA/FBI

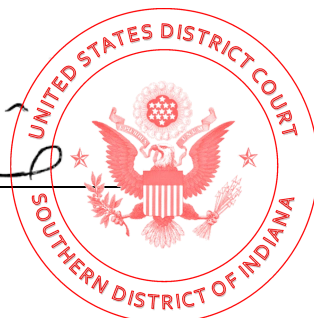
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by  
telephone (reliable electronic means)

Date: March 12, 2021

City and state: Indianapolis, Indiana

  
Mark J. Dinsmore  
United States Magistrate Judge  
Southern District of Indiana



**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT  
AND ARREST WARRANT**

I, LEONARD P. ROTHERMICH, being duly sworn according to law, depose and state as follows:

**I. INTRODUCTION**

1. I am and have been employed as a Special Agent with the Federal Bureau of Investigation ["FBI"] since November of 2014. Prior to that time, I spent 22 weeks training to be a Special Agent at the FBI Academy in Quantico, Virginia beginning on June 15, 2014. Through the FBI, I have received extensive training related to the investigation of federal crimes to include violent crime and firearms offenses. Prior to this, I spent five years on active duty in the United States Army as an officer in the Military Police Corps. I am currently assigned to the FBI Violent Crime Task Force ["VCTF"] in the Indianapolis Field Office of the FBI. In this assignment, I investigate all manner of violent crime, to include armed commercial robberies and firearm related offenses.

2. This affidavit is submitted in support of an application for a Warrant for Arrest of Ross Hoover ["HOOVER"], white male, date of birth ["DOB"] XX-XX-1987. Based on my training and experience, and based on the facts below, there is probable cause to believe that HOOVER committed one count of being in violation of Title 18 USC, Sec. 1951 on January 4, 2021. Based on the obtained statements and evidence within this investigation, your Affiant believes that there is probable cause to prove the following:

- a. HOOVER committed a robbery of the Comfort Inn, located at 5040 South East Street, Indianapolis, Indiana, on January 4, 2021.

3. Title 18, United States Code, Section 1951(a) states: Whoever in any way or degree obstructs, delays, or affects commerce or the movement of any article or commodity in commerce, by robbery or extortion or attempts or conspires to do so, or commits or threatens physical violence to any person or property in furtherance of a plan or purpose to do anything in violation of this section shall be fined under this title or imprisoned not more than twenty years, or both.

4. The statements contained in this affidavit are based in part on information provided by, and conversations held with, Special Agents and Task Force Officers [“TFOs”] of the FBI; detectives and patrol officers of the Indianapolis Metropolitan Police Department [“IMPD”]; witnesses; and on my experience and background as a Special Agent of the FBI.

5. I have not included each and every fact that has been revealed through the course of this investigation. I have set forth only the facts that are believed to be necessary to establish the required foundation for this issuance of the requested Warrant for Arrest.

## **II. BACKGROUND OF THE INVESTIGATION**

6. On January 4, 2021, at approximately 1:54 am, HOOVER entered the Comfort Inn, located at 5040 South East Street, Indianapolis, Indiana. He wore a tan knit hat with a distinct square patch logo on it, a mask covering the lower portion of his face that had contained a large cartoonish style mouth that was baring its teeth printed over it, a black colored leather jacket, a gray fleece underneath the jacket, a white t-shirt partially visible with a red and white colored logo over the chest, blue jeans, and a pair of gray colored shoes with black soles. HOOVER first walked over to a cooler within the waiting area and removed a can of soda. He next asked the lone employee [“the VICTIM”], who was working behind the check-in counter, how much a room for the night cost. HOOVER then asked her for paper and something to write

with. She provided him with a small notepad and pen. HOOVER took the two items to a nearby table by the cooler and began writing for approximately a full minute. Once finished, he passed the notepad back over the check-in counter to the VICTIM. The VICTIM would later inform officers with the IMPD that the note ordered her to open the cash register and then sit down on the floor. Upon reading these instructions, the VICTIM opened the register and handed him loose US currency from its drawer. HOOVER took the money and fled from the business. The VICTIM then contacted 911 to report the robbery. IMPD officers responded to this call.

7. The IMPD recovered the Comfort Inn's internal and external surveillance footage of the incident that was recorded by the hotel's camera system. The cameras showed the events described above. Further footage recovered showed HOOVER flee into a white colored Chevy Tahoe with black wheels that had been parked in front of the business at the time of the robbery. Its driver's side headlight also appeared to be inoperable. Furthermore, there was visible damage above the front passenger side wheel fender.

8. Following this robbery, TFO Nick Andrews ["TFO Andrews"] queried the online camera database system most commonly known as Flock. Flock is a private company that currently maintains a contract with the IMPD and city of Indianapolis to install and maintain cameras at major intersections throughout Marion County, Indiana. These cameras record images of vehicles and visible license plates as they travel through these intersections. The images are then maintained and searchable within the Flock system for approximately 30 days. Certain law enforcement investigators, to include your Affiant and TFO Andrews, were granted access to the system for investigative purposes. Specifically, law enforcement can search the database for specific license plates and/or makes, models, colors, types, and so forth of vehicles. If the search

request matches any of the stored images within the Flock system, the website then populates these findings for further review.

9. TFO Andrews entered HOOVER's vehicle description into the Flock online database. Through this effort, he located a white colored 2002 Chevy Tahoe, bearing Indiana license plate 968SAL, that had the exact same features and damage as the one that HOOVER was seen entering on January 4, 2021. Further investigation into the vehicle showed that it was registered to Cynthea Allegree ["ALLEGREE"], white female, DOB XX-XX-1987. TFO Andrews then researched ALLEGREE in IMPD's online reporting database known as Motorola. This database maintains all of the IMPD's reports regarding their officer and detective encounters with the general public. Upon searching her name and identifiers in Motorola, TFO Andrews learned that she had multiple reports involving HOOVER, whom she had described to law enforcement as her boyfriend.

10. TFO Andrews obtained further records regarding HOOVER from Motorola, the Indiana Bureau of Motor Vehicles, and the Marion County (Indiana) Sheriff's Office. HOOVER appeared to a physical match to the robber of the Comfort Inn on January 4, 2021. HOOVER also maintained four prior convictions for Robbery within the state of Indiana. Three of these convictions were listed under the same cause number, which was 49G01-1202-FC-001120. The Marion County (Indiana) Prosecutor's Office filed the case in 2011 following an investigation done by the IMPD. TFO Andrews obtained the IMPD's report for their investigation into a robbery of the Jameson Inn, located at 4402 Creek View Drive, Indianapolis, Indiana, on October 22, 2011 at approximately 2:03 am. In the incident, HOOVER approached the front desk and asked for towels. He then presented the female employee with a handwritten note,

which ordered her to give him money from the cash register drawer and then to sit down. The IMPD ultimately identified HOOVER to be the robber that morning, for which he was arrested and charged.

11. TFO Andrews further investigated HOOVER by searching his name in the Leads Online database. This system tracks local pawn information, in which the seller is required to submit a copy of his or her identification and fingerprints as part of the transaction. Certain pawnshops also have cameras that would take the seller's photograph in real-time. All of this information, to include the item that was sold, would be uploaded to the Leads Online website, where local and federal law enforcement could search for known stolen items or specific sellers. In doing this, TFO Andrews located pawn records for HOOVER, in which he sold multiple items at shops within Indianapolis between January 3, 2021 and January 7, 2021. On January 3, 2021, HOOVER sold a Roku stick and projector to the Disc Replay Indianapolis store, located 7317 US 31 South, Indianapolis, Indiana. In the photo taken of him, HOOVER wore what appeared to be the same tan knit hat, black leather jacket, gray fleece, and had the cartoon face mask pulled down around his neck.

12. On February 11, 2021, the IMPD Covert Robbery Unit ["IMPD CRU"] and FBI VCTF located ALLEGREE's white Chevy Tahoe parked in the lot of the Quality Inn, located at 9251 Wesleyan Road, Indianapolis, Indiana. They initiated surveillance on the vehicle until they observed a male matching HOOVER's description exit the hotel and enter it. They then detained him and confirmed the male to be HOOVER. They learned from the hotel's management that he had been staying in Room 142 of the Quality Inn. The Marion County (Indiana) Superior Court

then issued warrants for law enforcement to search Room 142 as well as the Chevy Tahoe for evidence related to the robbery investigation.

13. Inside Room 142 of the Quality Inn, investigators located and seized the black leather jacket.

14. In the Chevy Tahoe, bearing Indiana license plate 968SAL, investigators located and seized the white t-shirt with the red and white colored logo over the chest.

15. Both of these items were transported to the IMPD Property Room for holding.

16. The IMPD transported HOOVER to the IMPD Robbery Office for questioning. Upon his arrival, TFO Andrews presented him with his *Miranda* rights. HOOVER stated that he understood his rights and waived them by signing an IMPD Advice of Rights form. HOOVER ultimately admitted to committing the robbery of the Comfort Inn on January 4, 2021.

17. All of these events transpired within the Southern District of Indiana.

### **III. CONCLUSION**

18. Based on the information detailed above, I believe there is probable cause that HOOVER committed one count of being in violation of Title 18 USC, Sec. 1951(a)(1) for the robbery of the Comfort Inn, located at 5040 South East Street, Indianapolis, Indiana, on January 4, 2021.

19. Accordingly, I respectfully request the Court to issue a criminal complaint and arrest warrant charging HOOVER with this offense.

FURTHER YOUR AFFIANT SAITH NOT

/s/ Leonard P. Rothermich

Leonard P. Rothermich

Special Agent

Federal Bureau of Investigation

Attested to by the applicant in accordance with the Requirements of Fed. R. of Crim. P. 4.1 by telephone.

Dated: March 12, 2021

  
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Mark J. Dinsmore  
United States Magistrate Judge  
Southern District of Indiana

